

Return		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of :		
Inventory of the property taken and name(s) of any person(s) seized:		
Certification		
<p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 30%;"> <p>Date: _____</p> </div> <div style="width: 65%;"> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Executing officer's signature</i></p> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Printed name and title</i></p> </div> </div>		

ATTACHMENT A

Property to Be Searched

- a. A black Apple iPhone
 - i. The device is currently at the Wauwatosa Police Department under evidence item#: 23-004016-2.

This warrant authorizes the forensic examination of the Devices for the purpose of identifying the electronically stored information described in Attachment B.

ATTACHMENT B

Particular Things to be Seized

1. All records on the Device described in Attachment A that relate to the violation of Title 18, United States Code, Sections 2113(a) (Bank Robbery) involving Russell Roquemore or any other subject, stored on the Devices, to include:

- a. any information related to the planning, execution and concealment of the above-described offense, including photographs, text messages, emails, or any other communication information, including information in social media and other applications located on the device;
- b. evidence of communication with other potential targets or co-actors related to the planning, execution, and concealment of the above-described offense;
- c. any information recording any targets' schedule or travel;
- d. any web search information related to the offenses described above;
- e. photographs of locations evidencing pre-robbery surveillance or vehicles or people related to the offenses described above;
- f. any information related to the proceeds from the robberies described above;
- g. any communications via text messages, email, Facebook, Twitter, or other web-based applications between the subjects and others regarding the offense described above; and
- h. all bank records, checks, credit card bills, account information, and other financial records.

2. Evidence of user attribution showing who used or owned the devices at the time the things described in this warrant were created, edited, or deleted, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history.

As used above, the terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of electronic storage and any photographic form.

Dec 20, 2023

s/ JDH

Deputy Clerk, U.S. District Court
Eastern District of Wisconsin

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)A black Apple iPhone. The device is currently at the Wauwatosa
Police Department under evidence item#: 23-004016-2.Case No. **23-M-538 (SCD)**

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Please see Attachment A.

located in the Eastern District of Wisconsin, there is now concealed (identify the person or describe the property to be seized):

Please see Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
18 U.S.C. § 2113(a)

Bank Robbery

Offense Description

The application is based on these facts:

Please see Affidavit.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Kevin Kaiser

Applicant's signature

Kevin Kaiser, Special Agent, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
_____ telephone _____ (specify reliable electronic means).Date: 12-20-23

Stephen C. Dries

Judge's signature

City and state: Milwaukee, WI

Honorable Stephen C. Dries, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, Kevin Kaiser, being first duly sworn on oath, on information and belief state:

I. INTRODUCTION, BACKGROUND, TRAINING, AND EXPERIENCE:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since April 2023. Since April 2023, I have been assigned to FBI's Milwaukee Area Violent Crimes Task Force (MAVCTF), a multi-jurisdictional law enforcement entity charged with investigating violations of federal law, including bank robberies, commercial robberies, armed motor vehicle robberies, and other violent crime matters, defined under Title 18 of the United States Code. I have been trained in a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting of search warrant affidavits, and probable cause. I have participated in criminal investigations, surveillance, search warrants, interviews, and debriefs of arrested subjects. As a result of this training and investigative experience, I have learned how and why violent actors typically conduct various aspects of their criminal activities.

2. Based upon my training and experience, I know that computer hardware and software may be important to a criminal investigation in two distinct and important respects: (1) the objects themselves may be instrumentalities, fruits, or evidence of crime; and/or (2) the objects may have been used to collect and store information about crimes (in the form of electronic data). Rule 41 of the Federal Rules of Criminal Procedure permits the government to search and seize computer hardware and software which are (a) instrumentalities, fruits, or evidence of crime, or (b) storage devices for information about crime.

3. To this end, based upon my training and experience, I know that individuals involved in violent crimes use cellular telephones to maintain contact with co-conspirators aurally

or via electronic message in “text” format. I also know that it is common for suspects who commit violent crimes to take or cause to be taken photographs and other visual depictions of themselves, and their associates.

4. Based on the investigation to date, there is probable cause to believe that Paul Banks (DOB XX/XX/1994) and Russell Roquemore (DOB XX/XX/2002) conspired with one another to commit and committed a bank robbery of an ATM technician, in violation of Title 18, United States Code, Sections 2113(a) (Bank Robbery) in the Eastern District of Wisconsin on October 27, 2023. Paul Banks and Russell Roquemore were charged by criminal complaint in the Eastern District of Wisconsin on November 28, 2023.

5. This affidavit is based upon my personal knowledge, my training and experience, and on information reported to me by other state and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable. This affidavit is also based upon police reports, physical surveillance, and witness statements that I consider to be reliable as set forth herein. The facts of this Affidavit are based upon information obtained from my investigation, as well as information I have received from other law enforcement officers.

6. Because this affidavit is submitted for the limited purpose of obtaining a search warrant, I have not included each and every fact known to me concerning this investigation. I have attempted to set forth only the facts that I believe are pertinent to establishing the necessary foundation for the warrant.

II. IDENTIFICATION OF THE DEVICE TO BE EXAMINED

7. This affidavit is submitted in support of an application for a search warrant for the below-described portable electronic device, which is currently in evidence at Wauwatosa Police

Department located at 1700 N. 116th St., Wauwatosa WI 53226, for evidence of the user's possible involvement of a bank robbery of an ATM technician described in detail below:

a. Black iPhone

i. Wauwatosa inventory evidence number 23-004016-2.

8. The applied-for warrant would authorize the forensic examination of the Devices for the purpose of identifying electronically stored data particularly described in Attachment B.

III. PROBABLE CAUSE

9. On Friday, October 27, 2023, at approximately 2:11pm, Wauwatosa (WI) Police Officers were dispatched to the Wells Fargo Bank located at 2675 North Mayfair Road, Wauwatosa, WI for a report of a robbery. Upon arrival, officers learned an individual servicing the Wells Fargo Bank ATM was robbed by force. A total of \$170,650 U.S. currency was stolen during the robbery.

10. Wauwatosa Police Detective Jeremy Bronner spoke with the victim, identified as SRV. SRV stated that he is an employee of NCR Atleos and services ATMs. On October 27, 2023, at approximately 1:40pm, SRV arrived at the ATM located at the Wells Fargo Bank at 2675 North Mayfair Road to service the ATM. After being at the ATM for approximately thirty minutes, SRV observed two subjects walk towards him. One of the subjects pushed him backwards. The two subjects then grabbed two cassettes each (total of four cassettes) from the ATM and ran back to a white SUV parked near SRV's vehicle. The subjects then fled in the vehicle southbound on North Mayfair Road.

11. SRV described the two subjects as:

- a. Suspect 1 – Black male, unknown age, unknown height, thin build. He was wearing a light-colored long sleeve shirt, blue jean pants and gym shoes. The suspect's face was covered with a mask, and he was wearing blue surgical gloves.
- b. Suspect 2 – Black male, unknown age, unknown height, thin build. He was wearing a light-colored long sleeve shirt, blue jean pants and gym shoes. The suspect's face was covered with a mask, and he was wearing blue surgical gloves.

12. SRV described the vehicle the suspects fled in as a white Ford Bronco with Illinois plate.

13. SRV did not consent to being robbed.

14. Wauwatosa Police Detective Martin Keck is aware that video footage of the robbery was collected. The video shows two suspects wearing grey hooded sweatshirts, one with grey pants and one with black pants approach the ATM and take the cassettes out of the ATM. The suspects are masked and wearing gloves. The video collected depicts a white Ford Bronco Sport with black rims and black tinted windows as the suspect vehicle.

15. A search of the scene by Detectives revealed recovery of a driver's license for Paul Roosevelt Banks III (M/B XX/XX/1994) in the parking lot where the robbery occurred. The driver's license was located directly behind (to the west of) the victim's work vehicle. This is the location the suspects came from prior to the robbery and ran to after the robbery. The driver's license was in a bundle of US currency folded in half. Banks has a listed address of XXX Junell St., Houston, TX 77088.

16. Detective Keck conducted a record check of Banks. The records check revealed Banks is currently on federal probation and has a fully extraditable warrant for a probation violation through the United States Marshalls Service. He was placed on probation for robbery. Banks has a criminal history involving armed robberies including ATM robberies and pharmacy robberies.

17. Investigators conducted a FLOCK check in the area of the robbery. FLOCK is a software program that allows users to search for vehicles and license plates captured by cameras that are dispersed throughout the Milwaukee area. The software allows you to search for vehicles by license plate or run queries based off of vehicle color, make and style. Investigators located a white Ford Bronco Sport with black rims and tinted windows bearing a California license plate of 9AFZ537 traveling northbound on North Mayfair Road at West Bluemound Road on October 27, 2023 at 1:32pm. Still images of the FLOCK image were compared with images of the suspect auto at the robbery scene and all of the features of the vehicle were found to be a match.

18. Additionally, a search of the FLOCK system revealed that the Ford Bronco was in Houston, Texas as late as 9:14pm on Wednesday, October 25, 2023. Thus, the vehicle traveled from Texas to Wisconsin sometime after 9:14pm on October 25, 2023. On October 26, 2023, at 3:57pm, the vehicle was captured by a FLOCK camera in the City of West Allis.

19. Detective Keck conducted a records check of CA license plate 9AFZ537 and learned that the vehicle is registered to a 2021 Ford. The VIN of the vehicle is 3FMCR9B63MRB31756. The vehicle is registered to Hertz Vehicles, LLC – a rental car.

20. Following the robbery, investigators continued to search FLOCK and other license plate cameras throughout the United States and did not get any readings on the vehicle.

21. Wauwatosa Police Detective Nick Stahl reviewed DOT video cameras in the area of the robbery. He concluded the suspect vehicle likely turned westbound on West North Avenue at North Mayfair Road. This turn lane is not captured by cameras, but all of the likely escape routes were recorded by cameras. In viewing all of the likely escape routes, the suspect vehicle was not captured, leading to Detective Stahl's conclusion that the vehicle likely turned westbound on West North Avenue.

22. On November 1, 2023, at approximately 12:55pm, Detective Keck and Milwaukee County District Attorney's Office Investigator Steven Strasser checked the area to the west of North Mayfair Road and West North Avenue and discovered the 2021 Ford Bronco bearing CA registration plates of 9AFZ537 located in the parking lot of Normandy Village, in the 2500 block of North 124th Street, in the City of Wauwatosa, County of Milwaukee, State of Wisconsin. The Normandy Village parking lot is approximately sixteen blocks to the west and approximately two blocks to the south of where the robbery occurred.

23. The Ford Bronco was covered in snow, indicative of not traveling for at least the last day. The vehicle was backed into a parking spot. In plain view, detectives observed the passenger compartment was clean, but a water bottle was in the cup holder of the passenger's side front door. The Ford Bronco was seized and towed to the Wauwatosa Police Department's secure evidence garage.

24. On November 1, 2023, Detective Keck applied for and was granted a search warrant in Milwaukee County Circuit Court to forensically examine the recovered Ford Bronco that was used to commit the Robbery.

25. On November 2, 2023, Detective Bradley Isaacson removed the Electronic Control Unit (ECU) as trained from the Ford Bronco. Detective Isaacson used the digital forensic software Berla iVe tool to complete a logical acquisition from the module. Detective Isaacson analyzed the data from vehicle's infotainment and telematics' systems.

26. Detective Isaacson reviewed the Ford Bronco's tracklog which showed the vehicle was present in the Wells Fargo parking lot at the time of the Robbery. The vehicle's track log showed the vehicle departed the bank's parking lot and traveled southbound on North Mayfair Road. The vehicle turned westbound on West North Avenue and continued northbound on North 124th Street. The vehicle then parked at Normandy Village.

27. Detective Isaacson determined an iPhone with the friendly name of "Paul's iPhone" connected to the Ford Bronco at the following dates/times:

c. 10/26/2023

i. 4:06:04am

d. 10/27/2023.

i. 6:17:35am

ii. 7:01:13am

iii. 7:15:51am

iv. 12:58:07pm

v. 2:17:30pm

vi. 6:40:08pm

28. Detective Isaacson determined that “Paul’s iPhone” was disconnected from the vehicle at 2:17pm on October 27, 2023, while parked at Normandy Village, 2500 block of North 124th Street in the City of Wauwatosa. This information is consistent with the vehicle’s tracklog history, and the ignition being turned off. This is the same location Detective Keck recovered the vehicle from.

29. With the use of the forensic tools, Berla iVe, Detective Isaacson identified “Paul’s iPhone’s” unique identifying number as A8FE9D66175D and a subscriber phone number of 713-658-5668. The service provider for the phone number is AT&T.

30. Detective Isaacson conducted additional analysis of the vehicle’s tracklog on October 26, 2023, and October 27, 2023. Detective Isaacson determined the vehicle was present at the Super 8 by Wyndham, 7601 118th Ave, Pleasant Prairie, WI on the evening hours on October 26, 2023, and the early morning hours on October 27, 2023.

31. Detective Keck made contact at the Super 8 on November 2, 2023, and was shown the Ford Bronco on surveillance video. Detective Keck learned the renter of the room associated with the Ford Bronco was a Russell Roquemore and that the vehicle was present at the Super 8 on October 26th and 27th, 2023. The hotel staff provided an address of 1718 Granger St, Houston, TX for Roquemore.

32. Detective Isaacson also discovered the occupants of the Ford Bronco used the gas station north of the Super 8. The gas station was identified as Mobile Gas Station, 7511 118th St, Pleasant Prairie, WI. Detective Keck obtained surveillance video from the gas station on

November 2, 2023, and observed an individual exit the Ford Bronco and entered the store. Still images were captured of the black male subject.

33. Additionally, Detective Keck utilized a law enforcement tool Automated Facial Recognition (AFR). The gas station photographs were loaded into the program which yielded a 100% return identifying the subject as Russell Roquemore with a date of birth as XX/XX/2002. Detective Keck confirmed the individual depicted in the video was Russell Roquemore.

34. Detective Isaacson reviewed “Paul’s iPhone” within the Berla iVe digital report which showed 251 contacts were captured when “Paul’s iPhone” was synced to the Ford Bronco.

35. Detective Isaacson located the contact name “Russ” with a cellphone number of 346-210-7043 within the 251 contacts.

36. Detective Isaacson also located another iPhone device that was connected to the Ford Bronco on October 26, 2023, at 9:06:33 am. Detective Isaacson identified the iPhone’s unique identifying number as 2CC2537EE908 and a subscriber phone number of 346-210-7043. The service provider for the phone number is Verizon.

37. Detective Isaacson conducted an open search through the popular financial application “Cash App” and searched the phone number 346-210-7043 which showed the phone number is associated with the name Russell Roquemore (\$Kingruss6).

38. On November 2, 2023, Detective Isaacson drafted a search warrant to track the device associated with the phone number 713-658-5668. The warrant was authorized by the Milwaukee County Circuit Court. On November 3, 2023, Detective Keck received historical

records associated with the phone number 713-658-5668. Detective Keck found the following relevant to this investigation:

- e. The listed user of the device is “Paul Banks.”
- f. The cell site data associated with the phone number was consistent with moving with the Ford Bronco (compared with data obtained from the Berla iVe extraction), including being present in the area of the robbery at the time of the robbery as well as various locations investigators obtained video of the Ford Bronco and its occupants.
- g. The device was connected to cell sites in the area of Chicago O’Hare International Airport as late as 6:13am on October 28, 2023. The device was then connecting to cell sites in the area of George Bush International Airport at 8:23am on October 28, 2023.
- h. The IMSI associated with the account is 310280030879818.

39. On November 3, 2023, Detective Isaacson drafted a search warrant to track the device associated with the phone number 346-210-7043. The warrant was authorized by the Milwaukee County Circuit Court. On November 6, 2023, Detective Keck received historical records associated with the phone number 346-210-7043. Detective Keck found the following relevant to this investigation:

- i. The listed user of the device is “Russell Roquemore”.
- j. The cell site data associated with the phone number was consistent with moving with the Ford Bronco (compared with data obtained from the Berla

iVe extraction), including being present in the area of the robbery at the time of the robbery as well as various locations investigators obtained video of the Ford Bronco and its occupants.

k. The device connected to cell sites in the area of Chicago O'Hare International Airport as late as 6:13am on October 28, 2023. The device was then connecting to cell sites in the area of George Bush International Airport at 8:23am on October 28, 2023.

l. The IMSI associated with the account is 311480028275342.

40. On October 28, 2023, (day after robbery) the Verizon account with the phone number 346-210-7043 was changed to 832-596-8820. The subscriber remained Russell Roquemore.

41. FBI Special Agent Rienerth informed Detective Keck that the AT&T account with the phone number 713-658-5668 was changed to 832-258-6943 on November 3, 2023.

42. Task Force Officer (TFO) Massari, who is employed as a United States Postal Inspector, followed up at various locations from the Ford Bronco's extraction report indicated the vehicle was at the Dick's Sporting Goods, located at 9899 76th Street, in the City of Kenosha, WI from 5:52pm to 6:02pm on October 26, 2023. TFO Massari obtained an image of the suspects entering the Dick's Sporting Goods. In the photo, the suspects are wearing what appears to be the same sweatshirt and pants that the suspects were wearing during the robbery. Detective Keck compared images of the suspects at Dicks with known images of Russell Roquemore and Paul Banks. Detective Keck identified the people at Dicks to be Russell Roquemore, (wearing the grey pants) and Paul Banks (wearing the black pants).

43. Search warrants were obtained by Detective Isaacson through the Milwaukee County Circuit Court to obtain live cell site and other precision location information from AT&T related to phone number 832-258-6943 and from Verizon related to phone number 832-596-8820. This information has been analyzed by Detective Keck. After returning to Houston, TX the day after the robbery, the devices have remained in the Houston metropolitan area.

44. On November 28, 2023, Russell Roquemore and Paul R. Banks III were charged by criminal complaint in the Eastern District of Wisconsin for violations of Title 18, United States Code, Sections 2113(a) (Bank Robbery). On November 28, 2023, Magistrate Judge William E. Duffin signed arrest warrants for Russell Roquemore and Paul R. Banks III.

Arrest Russell Roquemore and Paul Banks

45. On December 4, 2023, Detective Keck and FBI Special Agent Kevin Kaiser, with assistance from the FBI Houston Office, located and arrested Roquemore and Banks in separate locations in Houston, Texas. Roquemore and Banks were located using gps pings from their cellphones. Roquemore was in possession of a black Apple iPhone at the time of his arrest. Roquemore's phone was seized by members of FBI Houston and turned over to Detective Keck. The cellphone is currently in evidence at the Wauwatosa Police Department.

IV. TECHNICAL TERMS

46. Based on my training and experience, I use the following technical terms to convey the following meanings:

- a. Wireless telephone: A wireless telephone (or mobile telephone, or cellular telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or

traditional “land line” telephones. A wireless telephone usually contains a “call log,” which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic “address books;” sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include global positioning system (“GPS”) technology for determining the location of the device.

- b. Digital camera: A digital camera is a camera that records pictures as digital picture files, rather than by using photographic film. Digital cameras use a variety of fixed and removable storage media to store their recorded images. Images can usually be retrieved by connecting the camera to a computer or by connecting the removable storage medium to a separate reader. Removable storage media include various types of flash memory cards or miniature hard drives. Most digital cameras also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.
- c. Portable media player: A portable media player (or “MP3 Player” or iPod) is a handheld digital storage device designed primarily to store and play audio, video, or photographic files. However, a portable media player can also store other digital data. Some portable media players can use removable storage media. Removable storage media include various types of flash memory cards or miniature hard drives.

This removable storage media can also store any digital data. Depending on the model, a portable media player may have the ability to store very large amounts of electronic data and may offer additional features such as a calendar, contact list, clock, or games.

- d. GPS: A GPS navigation device uses the Global Positioning System to display its current location. It often contains records the locations where it has been. Some GPS navigation devices can give a user driving or walking directions to another location. These devices can contain records of the addresses or locations involved in such navigation. The Global Positioning System (generally abbreviated “GPS”) consists of 24 NAVSTAR satellites orbiting the Earth. Each satellite contains an extremely accurate clock. Each satellite repeatedly transmits by radio a mathematical representation of the current time, combined with a special sequence of numbers. These signals are sent by radio, using specifications that are publicly available. A GPS antenna on Earth can receive those signals. When a GPS antenna receives signals from at least four satellites, a computer connected to that antenna can mathematically calculate the antenna’s latitude, longitude, and sometimes altitude with a high level of precision.
- e. PDA: A personal digital assistant, or PDA, is a handheld electronic device used for storing data (such as names, addresses, appointments or notes) and utilizing computer programs. Some PDAs also function as wireless communication devices and are used to access the Internet and send and receive e-mail. PDAs usually include a memory card or other removable storage media for storing data and a keyboard and/or touch screen for entering data. Removable storage media include

various types of flash memory cards or miniature hard drives. This removable storage media can store any digital data. Most PDAs run computer software, giving them many of the same capabilities as personal computers. For example, PDA users can work with word-processing documents, spreadsheets, and presentations. PDAs may also include global positioning system (“GPS”) technology for determining the location of the device.

- f. Internet: The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

47. Based on my knowledge, training, and experience, as well as my conversations with other Special Agents of the Federal Bureau of Investigation, who are experienced with electronic communication systems, I know that the electronic Devices described above have capabilities that allow them to serve as a wireless telephone, digital camera, portable media player, GPS navigation device, and PDA. In my training and experience, examining data stored on devices of this type can uncover, among other things, evidence that reveals or suggests who possessed or used the device.

V. ELECTRONIC STORAGE AND FORENSIC ANALYSIS

48. Based on my knowledge, training, and experience, as well as my conversations with other Special Agents of the Federal Bureau of Investigation, who are experienced with electronic communication systems, I know that electronic devices can store information for long periods of time. Similarly, things that have been viewed via the Internet are typically stored for some period of time on the Devices. This information can sometimes be recovered with forensics tools.

49. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how the Devices were used, the purpose of use, who used it, and when.

50. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the device consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to, computer-assisted scans of the entire medium that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

51. *Manner of execution.* Because this warrant seeks only permission to examine devices already in law enforcement's possession, the execution of this warrant does not involve the physical intrusion onto a premise. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

VI. CONCLUSION

52. Based on the facts contained within this affidavit, I believe that probable cause exists to search the Device, which is more particularly described in Attachment A, and which is currently located in evidence at the Wauwatosa Police Department, for evidence of the aforementioned bank robbery of an ATM technician including but not limited to the information contained in Attachment B.

ATTACHMENT A

Property to Be Searched

- a. A black Apple iPhone
 - i. The device is currently at the Wauwatosa Police Department under evidence item#: 23-004016-2.

This warrant authorizes the forensic examination of the Devices for the purpose of identifying the electronically stored information described in Attachment B.

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Particular Things to be Seized

1. All records on the Device described in Attachment A that relate to the violation of Title 18, United States Code, Sections 2113(a) (Bank Robbery) involving Russell Roquemore or any other subject, stored on the Devices, to include:

- a. any information related to the planning, execution and concealment of the above-described offense, including photographs, text messages, emails, or any other communication information, including information in social media and other applications located on the device;
- b. evidence of communication with other potential targets or co-actors related to the planning, execution, and concealment of the above-described offense;
- c. any information recording any targets' schedule or travel;
- d. any web search information related to the offenses described above;
- e. photographs of locations evidencing pre-robbery surveillance or vehicles or people related to the offenses described above;
- f. any information related to the proceeds from the robberies described above;
- g. any communications via text messages, email, Facebook, Twitter, or other web-based applications between the subjects and others regarding the offense described above; and
- h. all bank records, checks, credit card bills, account information, and other financial records.

2. Evidence of user attribution showing who used or owned the devices at the time the things described in this warrant were created, edited, or deleted, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history.

As used above, the terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of electronic storage and any photographic form.